

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Sentencing: March 4, 2022

**MOTION FOR ENLARGEMENT OF TIME IN WHICH TO FILE MOTION FOR A
NEW TRIAL UNDER FEDERAL RULE OF CRIMINAL PROCEDURE 33 AND/OR
MOTION FOR JUDGMENT OF ACQUITTAL UNDER RULE 29 AND
MEMORANDUM IN SUPPORT**

Zackary Ellis Sanders, by and through counsel, respectfully submits this Motion for Enlargement of Time in Which to File Motion for a New Trial Under Federal Rule of Criminal Procedure 33 and/or a Motion for a Judgment of Acquittal Under Rule 29 and Memorandum in Support. In support of this motion, counsel respectfully submits as follows:

1. On October 26, 2021, Mr. Sanders was convicted after trial on twelve counts involving the production, receipt and possession of child pornography. Sentencing is scheduled for March 4, 2022.
2. Mr. Sanders has ordered trial transcripts, which he anticipates receiving towards the end of November or the beginning of December, 2021.
3. Under the fourteen days allotted under Rules 29 and 33, Mr. Sanders's motion(s) would be due on or about November 9, 2021.
4. By this motion, Mr. Sanders seeks 60 additional days to file any motion. The new due date would be January 9, 2022. This extension will allow Mr. Sanders and his counsel to

review the transcripts and fully investigate any issues that might necessitate a new trial or result in a judgment of acquittal. This is Mr. Sanders's first motion to continue the deadline for the filing of motions under Rule 33 or Rule 29.

WHEREFORE, the defendant respectfully submits that, for good cause shown, the Court should grant the instant motion and continue the deadline for any new trial motion and/or motion for a judgment of acquittal until January 9, 2022.

Respectfully submitted,

/s/

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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress